

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<p>LINNEA MICHAELS, MARY-KATHRYN ZONI, and REV. SUSAN J. McCONE</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>FELLOWSHIPS AT AUSCHWITZ FOR THE STUDY OF PROFESSIONAL ETHICS <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Docket No. 1:20-cv-05414-RA</p> <p><b>DEFENDANTS' LOCAL CIVIL RULE 56.1 STATEMENT OF MATERIAL FACTS</b></p>
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Defendants Fellowships at Auschwitz for the Study of Professional Ethics, Inc. ("FASPE"), C. David Goldman, Andrew Eder, Eric Muller, Debbie Bisno, Nancy Angoff, Frederick Marino, and Thorsten Wagner hereby submit the following Local Civil Rule 56.1 Statement of Material Facts:

1. FASPE has never been served with an administrative charge or complaint of discrimination or retaliation filed by any of the Plaintiffs with the Equal Employment Opportunity Commission, the New York State Division of Human Rights, or any other governmental agency. (Decl. of C. David Goldman, submitted herewith, ¶2.)

Respectfully submitted,

**FISHER & PHILLIPS LLP**  
Attorneys for Defendants

Dated: March 16, 2021

By: s/David E. Strand  
DAVID E. STRAND

The New York Times Building  
620 Eighth Avenue, 36th Floor  
New York, NY 10018

430 Mountain Avenue, Suite 303  
Murray Hill, NJ 07974